

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD OF PUERTO RICO,

PROMESA
Title III

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et*
al.,¹

No. 17 BK 3283-LTS
(Jointly Administered)

Debtors.

**NOTICE OF THE QTCB NOTEHOLDER GROUP
OF INTENT TO PARTICIPATE IN DISCOVERY
FOR CONFIRMATION OF COMMONWEALTH PLAN OF ADJUSTMENT**

The QTCB Noteholder Group² hereby submits its notice of intent to participate in discovery for confirmation of the *Seventh Amended Title III Joint Plan of Adjustment of the Commonwealth of Puerto Rico, et al.* [Dkt. No. 17627], as amended, modified, or supplemented (the “Plan”), pursuant to the Court’s *Order Establishing Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [Dkt. No. 17640], and respectfully states as follows:

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID 9686); (v) Puerto Rico Electric Power Authority (Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers listed as Bankruptcy Case numbers due to software limitations).

² The QTCB Noteholder Group has the same meaning as set forth in *Notice of Appearance and Request for Notice* (Dkt. No. 134, Case No. 17-3283 LTS) and *Tenth Supplemental Verified Statement of the QTCB Noteholder Group Pursuant to Bankruptcy Rule 2019* (Dkt. No. 17296, Case No. 17-3283).

1. The QTCB Noteholder Group advises the Debtors that it intends to participate in discovery in connection with confirmation of the Plan.

2. The contact information of the QTCB Noteholder Group is as follows:

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3. Information concerning claims of the members of the QTCB Noteholder Group, as set forth in certain proofs of claim filed in these Title III Cases, is set forth in **Exhibit A** hereto.

WHEREFORE, the QTCB Noteholder Group respectfully requests that the Court take notice of the foregoing.

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RESPECTFULLY SUBMITTED,

Dated: August 6, 2021
San Juan, Puerto Rico

MORGAN, LEWIS & BOCKIUS LLP

/s/ Kurt A. Mayr

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Co-Counsel for the QTCB Noteholder Group

EXHIBIT A

Nature of Certain Claims of the Members of the QTCB Noteholder Group: Qualified School Construction Bonds and Qualified Zone Academy Bonds issued by PBA¹ and guaranteed by Commonwealth, and other full faith and credit bonds issued or guaranteed by the Commonwealth.

Claimant	Proof of Claim Number	Debtor
Canyon-ASP Fund, L.P.	125494	Commonwealth
	174385	PBA
Canyon Balanced Master Fund, Ltd.	125727	Commonwealth
	174380	PBA
Canyon Blue Credit Investment Fund L.P.	129774	Commonwealth
	174384	PBA
Canyon Distressed Opportunity Investing Fund II, L.P.	115697	Commonwealth
	174371	PBA
Canyon Distressed Opportunity Master Fund II, L.P.	115491	Commonwealth
	174369	PBA
Canyon-GRF Master Fund II, L.P.	119870	Commonwealth
	174388	PBA
Canyon NZ-DOF Investing, L.P.	116228	Commonwealth
	174373	PBA
Canyon-SL Value Fund, L.P.	143207	Commonwealth
Canyon Value Realization Fund, L.P.	122624	Commonwealth
	174378	PBA
Canyon Value Realization MAC 18, Ltd.	122563	Commonwealth
	174392	PBA
EP Canyon Ltd.	125330	Commonwealth
	174398	PBA
The Canyon Value Realization Master Fund, L.P.	159397	Commonwealth
	174397	PBA
Canyon GCM PR SPV, LLC	174393	PBA
Canyon Distressed TX (A) LLC	174363	PBA
Canyon-EDOF (Master) L.P.	174645	PBA
M.H. Davidson & Co.	107425	Commonwealth
	174381	PBA
Davidson Kempner International, Ltd.	152065	Commonwealth
	174377	PBA
	174375	PBA
Davidson Kempner Institutional Partners, L.P.	135953	Commonwealth
Davidson Kempner Partners	154556	Commonwealth
	174390	PBA
Davidson Kempner Distressed Opportunities Fund LP	124642	Commonwealth
	174401	PBA

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Notice of the QTCB Noteholder Group of Intent to Participate in Discovery for Confirmation of Commonwealth Plan of Adjustment*.

Claimant	Proof of Claim Number	Debtor
Davidson Kempner Distressed Opportunities International Ltd.	147091	Commonwealth
	174387	PBA
DKSOF IV Trading Subsidiary LP	174403	PBA
Gordel Capital Limited	125098	Commonwealth
Sculptor Credit Opportunities Master Fund, Ltd.	136008	Commonwealth
	174391	PBA
Sculptor Enhanced Master Fund, Ltd.	157569	Commonwealth
	174366	PBA
Sculptor GC Opportunities Master Fund, Ltd.	132715	Commonwealth
	174400	PBA
Sculptor Master Fund, Ltd.	113105	Commonwealth
	174367	PBA
Sculptor SC II, LP	126465	Commonwealth
	174368	PBA

I HEREBY CERTIFY that on August 6, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send automatic notifications of such filing to all attorneys of record.

**CORREA ACEVEDO & ABESADA
LAW OFFICES, P.S.C.**

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